

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

NATIONAL ASSOCIATION OF	)	
STUDENT LOAN ADMINISTRATORS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 3:21-cv-440
	)	
E. JOSEPH FACE, JR., et al.,	)	
	)	
Defendants.	)	
	)	

**NOTICE OF INTERVENTION**

The Commonwealth of Virginia, by and through Attorney General Mark R. Herring, hereby notifies the Court that it intervenes in this action, pursuant to 28 U.S.C. § 2403(b) and Federal Rule of Civil Procedure 5.1, in order to defend the constitutionality of Chapter 26 of Title 6.2 of the Code of Virginia (“Qualified Education Loan Servicers”). Because the Amended Complaint asks this Court to invalidate Virginia statutes that have been duly enacted by the General Assembly (see ECF No. 24 at 5, 33–43), the Commonwealth is permitted to intervene in this matter for the purpose of defending state law against constitutional challenge and to ensure a proper presentation of the facts and law relating to the question of constitutionality. See 28 U.S.C. § 2403. Counsel for Plaintiff and Defendants have advised that the parties do not object to the Commonwealth’s intervention in this matter.

Dated: October 8, 2021

Respectfully submitted,

**COMMONWEALTH OF VIRGINIA**

By: /s/ Jessica Merry Samuels  
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*Deputy Attorney General*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 8, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record for the parties.

/s/ Jessica Merry Samuels

Jessica Merry Samuels